



ARIZONA
Department of Environmental Quality

Interoffice Memorandum

TO : Cindy Greenway, Geologist, Technical Branch, Hazardous Waste Division (HWD)

THROUGH : Annette Cusher, Engineer Supervisor, Technical Branch, HWD

FROM : Clay McDaniel, Engineer, Technical Branch, HWD

DATE : August 26, 2009

SUBJECT : Comments on Feasibility Study Report dated August 11, 2009
AFIN 54-00068 EPA ID ARD990660649

They're proposal to address the drum vault is very similar to their earlier proposal described in the Facility Investigation Workplan Supplement No.3 dated August 28, 2008. Except this time they only propose to stabilize the drum contents which are determined to be non-hazardous, thus eliminating the requirement to obtain a permit. The concerns here are similar to concerns listed in ADEQ response letter dated September 12, 2008:

- They state "Based on the observed condition of the drums, individual drum removal is not anticipated to be feasible or necessary." However, as mentioned within Supplement No.3, there are some drums that are believed to be intact within the drum vault. These drums should be characterized separate from the water saturated sandy backfill material discovered during the most recent exploration activities conducted at the drum vault location.
- There is no plan to clean the drum vault side walls or bottom. Also, there is no plan to collect confirmation samples from the sidewall or bottom of the concrete slab.
- There is no plan to collect confirmation samples from below the concrete slab to determine if contamination has migrated beneath the concrete slab.